



**L**ake **A**rea **I**ndustry **A**lliance  
 P. O. Box 2225  
 Lake Charles, LA 70602  
 (337) 436-6800

**RECEIVED**  
 APR 20 2007  
 LA. DEPT. OF ENV. QUALITY  
 LEGAL AFFAIRS DIVISION

April 16, 2007

Mr. Louis Buatt  
 Louisiana Department of Environmental Quality  
 Office of the Secretary, Legal Affairs Division  
 P. O. Box 4302  
 Baton Rouge, LA 70821-4302

Dear Mr. Buatt,

The Lake Area Industry Alliance (LAIA) is a non-profit 501C3 corporation whose membership consists of the twenty-three major industrial facilities located in the Lake Charles / Calcasieu Parish Area. The names of the member companies are listed in the footer of this letter.

On behalf of the member companies of LAIA and pursuant to the petition provisions of LAC 33: Section 9, I am writing to formally request that LAC 33:III Section 510 be rescinded. A review of various state and federal rules and regulations has shown that there are sufficient other requirements in place to maintain emissions at levels that will not be detrimental to the general environment and the triggering of ozone. In addition, subsequent to the adoption of Section 510 in 2001, other rules and regulations have generated emission reductions to a degree that make it impossible to find offsets to meet the requirements of Section 510.

Air quality data from the LDEQ's monitoring activities as well as air quality data taken from LAIA ambient air monitoring sites have demonstrated that emissions are below state standards and ozone is in compliance with the 1-Hour Ozone Standard as well as the 8-Hour Ozone Standard. Attached are two graphs that show the average levels of NO<sub>x</sub> versus Ozone for a 5-year period. One graph provides the annual average and the other provides the average for the Ozone Season, both demonstrate positive trends for NO<sub>x</sub> and Ozone.

Several significant control measures have been implemented since the adoption of Section 510 that will ensure continued emission reductions and therefore improvements in air quality. Many of these are identified in the proposed Louisiana State Implementation Plan: Calcasieu Parish Section 110(a)(1) Maintenance Plan (Draft March 2007). (LAIA requests that the plan be incorporated into the docket for this request). Subsection 4.2 identifies the numerous federal measures recently adopted that will contribute to emission reductions. Tables 3-2 and 3-3 clearly

Air Liquid, Air Products, Alcoa Carbon, Arch Chemicals, Basell, BioLab, Cameron LNG, Certain Teed, Chemical Waste Mgt, CITGO Petroleum, ConocoPhillips, Entergy Gulf States, Firestone Polymers, Georgia Gulf, Grace Davison, Louisiana Pigment, PPG Industries, Sasol North America, Southern Ionics, Targa Midstream Services, TDC, Trunkline LNG, Westlake Chemical

Petition to Rescind, cont'  
April 16, 2007

page 2 of 2

illustrate the benefits to be realized from the gasoline and diesel desulphurization projects and vehicle emission standards that will reduce both VOC and NO<sub>x</sub> emissions from on-road and off-road mobile sources in the parish. Additionally, nine sources in Calcasieu Parish have been identified as being covered by the referenced Clean Air Interstate Rule (CAIR).

Additionally, virtually all of the reduction schemes mentioned apply not only to Calcasieu but also to the upwind areas which the DEQ has demonstrated have an impact on Calcasieu air quality. The mobile source rules and the refinery consent decrees will also greatly reduce emissions in Beaumont-Port Arthur and the Houston-Galveston areas in Texas.

Following are examples of some of the more significant emission reductions which have been implemented or are being planned around rules and requirements "other" than Section 510:

- Installation of Flare Gas Recovery Units & Flare Gas Scrubbing System – SO<sub>2</sub> reduction of 210 TPY.
- Installation of low NO<sub>x</sub> burners & shutdown of several sources - NO<sub>x</sub> reduction of 334 TPY
- Undertaking addition of NO<sub>x</sub> and SO<sub>2</sub> lowering catalyst.
- One facility is developing plans to reduce total NO<sub>x</sub> emissions by 6,600 TPY by 2011.

Finally, since the Section 510 rule applies solely to the Calcasieu Parish, LAIA requests that LDEQ consider those mechanism's available to the department to facilitate receipt of comments from interested parties in this region.

Favorable consideration of this petition to rescind Section 510 will greatly improve the potential for economic development in Calcasieu Parish without having a negative impact on the quality of the environment.

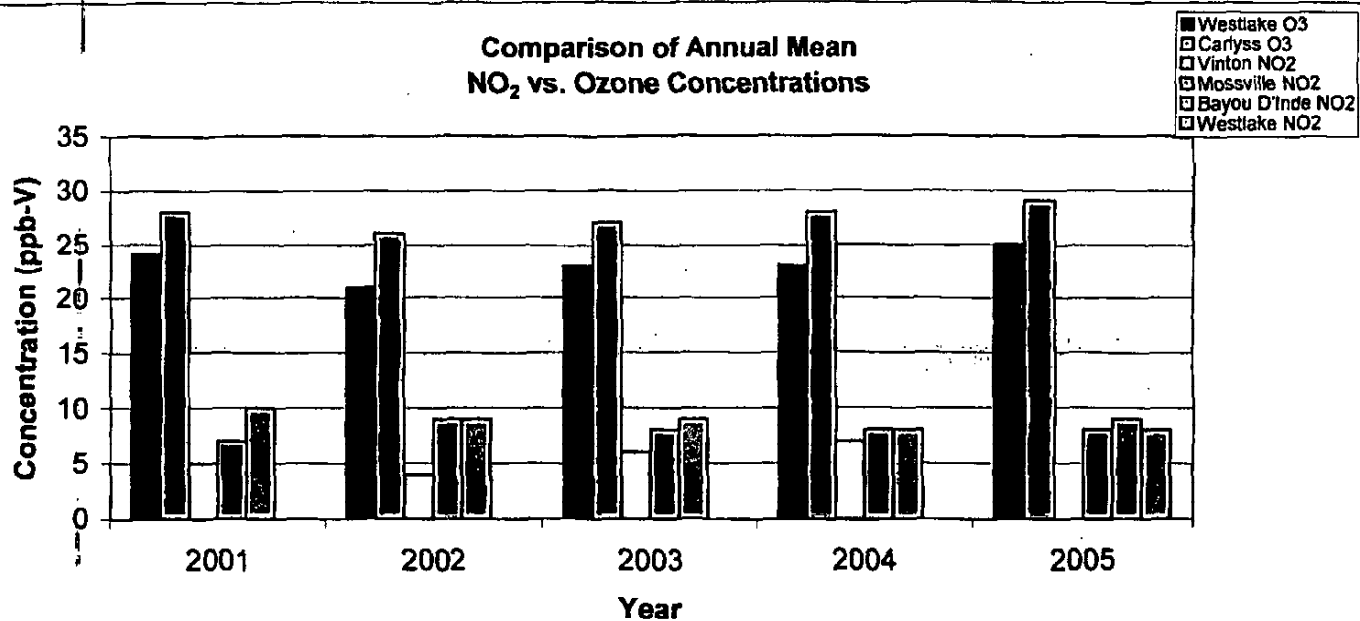
Sincerely Yours,



Larry DeRoussel – Executive Director  
Lake Area Industry Alliance

Attachment – Annual average for Ozone and NO<sub>x</sub>

**Comparison of Annual Mean  
NO<sub>2</sub> vs. Ozone Concentrations**



**Comparison of 5/1 through 9/15  
NO<sub>2</sub> vs. Ozone Concentrations**

